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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

**DECLARATION OF STEVE W. BERMAN IN
SUPPORT OF JOINT SUPPLEMENTAL
BRIEF IN SUPPORT OF FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

Judge: Hon. Claudia Wilken

1 I, STEVE W. BERMAN, declare as follows:

2 1. I am an attorney duly licensed to practice law before this Court. I am a member of the
3 Washington Bar, and I have been admitted to this Court *pro hac vice*. I am the managing partner of Hagens
4 Berman Sobol Shapiro LLP. Hagens Berman Sobol Shapiro LLP, alongside Winston & Strawn LLP, are
5 counsel of record for the Plaintiffs in this matter, having been appointed Co-Lead Class Counsel (“Co-
6 Lead Class Counsel”) for the certified damages and injunctive relief Classes by this Court. ECF No. 387
7 at 52; ECF No. 323 at 10. My business address is 1301 Second Avenue, Suite 2000, Seattle, Washington
8 98101, I am over the age of eighteen, am competent to testify, and do so based on my personal knowledge.

9 2. I make this declaration in support of the Joint Supplemental Brief in Support of Final
10 Approval of Class Action Settlement filed in the above referenced action.

11 3. Attached hereto as **Exhibit A** is a true and correct copy of the Third Amended Stipulation
12 and Settlement Agreement, dated April 14, 2025. The Third Amended Stipulation and Settlement
13 Agreement has revised the following sections in response to the Court’s comments at the Final Approval
14 Hearing: defining “College Football Playoff” in Paragraph (1)(j), revising the definition of the “Injunctive
15 Relief Settlement Class” in Paragraph (1)(aa), Paragraph 13 clarifying the intended recipients of the notice
16 program, Paragraph 14 clarifying intended recipients of the additional notice, Paragraph 19 revising the
17 description of the release of injunctive class claims, Paragraphs 20-21 and 36 including language regarding
18 future objections by Incoming Injunctive Relief Settlement Class Members. There are other non-
19 substantive redlines aligning formatting in response to these revisions.

20 4. Attached hereto as **Exhibit B** is a true and correct copy of the Third Amended Stipulation
21 and Settlement Agreement, dated April 14, 2025 [redline].

22 5. Attached hereto as **Exhibit C** is a true and correct copy of Co-Lead Class Counsel’s
23 proposed draft notice for future Division I college athletes regarding the injunctive relief portion of this
24 settlement.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true
2 and correct.

3 Executed this 14th day of April, 2025 at Seattle, Washington.

4 /s/ Steve W. Berman
5 STEVE W. BERMAN
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